FILED

# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

MAR/1 4 2019

U.S. DISTRICT COURT EASTERN DISTRICT OF MO ST. LOUIS

UNITED STATES OF AMERICA,	
Plaintiff,	
<b>v.</b>	No. 4:19CR00221 RLW/JMB
SHAWN WOOLDRIDGE,	
Defendant.	) )

### **INDICTMENT**

## **COUNT I**

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

- 1. Federal law defined the term:
  - (a) "minor" to mean any person under the age of eighteen years (18 U.S.C.§ 2256(a));
  - (b) "sexually explicit conduct" to mean actual or simulated
    - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
    - (ii) bestiality,
    - (iii) masturbation,
    - (iv) sadistic or masochistic abuse, or

- (v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A)); and
- (c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));
- (d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--
  - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or
  - (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct (18 U.S.C. §2256(8)).
- 2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
- 3. Between on or about September 1, 2018, and November 6, 2018, in the Eastern District of Missouri, and elsewhere,

### SHAWN WOOLDRIDGE,

the defendant herein, did knowingly receive image and video files of child pornography over the internet, a means or facility of interstate commerce, and the image and video were a visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of a minor engaging in sexually explicit conduct, including but not limited to the following:

- 1). (american w sound) boy you need.flv A graphic video file depicting a prepubescent minor male preforming oral sex on an adult male;
- 2). CP42.mp4 A graphic video file depicting a prepubescent minor female in lascivious display of her genitals and then inserting a lollipop into her vagina;
- 3) 12127767\_529445807218499\_771149493\_n.mp4 a graphic video file depicting a prepubescent minor female in lascivious display of her genitals;
- 4) (pthc) laura young new 0609 complete 20m58s\_pocketpc(2).avi) A graphic video file depicting a prepubescent minor female engaging in sex with an adult male.

In violation of Title 18, United States Code, Section 2252A(a)(2).

#### COUNT II

The Grand Jury further charges that:

- 1. The allegations contained in paragraphs one, two, and three of Count I of this Indictment are incorporated by reference as if fully set forth herein.
- 2. Between on or about September 6, 2018, and November 6, 2018, in the Eastern District of Missouri, and elsewhere,

### SHAWN WOOLDRIDGE,

the defendant herein, did knowingly receive image and video files of child pornography over the internet, a means or facility of interstate commerce, and the image and video were a visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual

depictions were of a minor engaging in sexually explicit conduct, including but not limited to the following:

- 1) 2ffcb79c-8ac5-4a22-a317-979c29ae1569.mp4 a graphic video file of a male attempting to penetrate the anus of a prepubescent minor child;
- 2) 5b907f5d-be34-4ce0-9c85-e66ede78d4fb.jpg a graphic video file of a female minor prepubescent child performing oral sex;
- 3) 2017-09-01 20.09.15.mp4 a graphic video of prepubescent minor female child's genitals being penetrated.

In violation of Title 18, United States Code, Section 2252A(a)(2).

	A TRUE BILL.
•	FOREPERSON
JEFFREY B. JENSEN United States Attorney	
COLLEEN C. LANG, #56872MO	